

To Rafael Casanova/R6/USEPA/US@EPA

CC

bcc

Subject Re: Pipeline

I will include that information and contact Michelle and Randy. Today we uncovered the pipeline that was capped and took pictures.

Stephen Halasz Environmental Department Manager Kleinfelder 3601 Manor Road Austin, TX 78723 (o) 512.926.6650 (c) 512.796.9449

>>> <Casanova.Rafael@epamail.epa.gov> 6/16/2006 2:35 PM >>> Stephen, for NORCO's deliverables due in July, please include the information in this e-mail and NORCO's determination (I would assume in the form of a removal report) that the pipelines (eleven pipelines which may or may not extend to the docking facilities) leading from NORCO's facility at Bishop Road to the former and current docking facilities in the bay are not a continuing source of contamination to the wetland areas. Also, please include Offshore Specialties' documentation of the work they performed in 2002 on the pipelines between Sunray Road and the docking facilities. It is my understanding that they flushed and capped a line(s). TCEQ may have this information, I'm not sure. Michelle Phillips' (TCEQ) telephone number is 361-825-3108. Randy Harbison's (Offshore's General Manager) telephone number is 361-776-9666.

Thanks for your help.

Rafael Abrego Casanova, P.G. (Remedial Project Manager, Environmental Scientist)

U.S. Environmental Protection Agency, Region 6 Superfund Division (6SF-AP) 1445 Ross Avenue, Suite 1200 Dallas, TX 75202-2733

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Assigned Sites for Investigation and Remediation (http://www.epa.gov/earth1r6/6sf/6sf-tx.htm):
Brine Service Company Superfund Site (Corpus Christi, Texas)
Falcon Refinery Superfund Site (Ingleside, Texas)
Many Diversified Interests, Inc. Superfund Site (Houston, Texas)

Stephen Halasz
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lder.com> To
Rafael Casanova/R6/USEPA/US@EPA
06/16/2006 01:52 cc
PM
Subject
Re: Pipeline

I'll get as much info as I can about the pipeline cuts to the old dock but as you saw the area is now paved and nobody is sure where they were cut, just that they were cut and capped. I'll interview them all again for more specifics. I'll also get dates for the docking facilities.

The sampling locations for the RI have several locations near the pipeline release from 2002. We determined that it was a low point due to the wetlands typically being wet in that location.

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>>> < <u>Casanova.Rafael@epamail.epa.gov</u> > 6/16/2006 1:32 PM >>> Stephen, thanks for the quick response.

As a follow up, where were the pipelines cut (and how many), at Offshore Specialties, when the current dock facility was put into service? Also, why are we assuming that the cut at Sunray Road would be a low point in elevation and fluids would drain to that point? My immediate concern is the current ongoing seepage of an oily substance between Sunray Road and the docking facilities. This issue will need to be addressed in NORCO's deliverables in July. Thanks for your help on this.

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Stephen Halasz <SHalasz@kleinfe lder.com> To Rafael Casanova/R6/USEPA/US@EPA 06/16/2006 12:56 cc PM Gary Moore/R6/USEPA/US@EPA, Gloria-Small Moran/R6/USEPA/US@EPA, Chuck Talton/R6/USEPA/US@EPA, Richard Bergner < rbergner@flash.net > Subject Re: Pipeline

I'm sorry if there has been a misunderstanding. The addendum to the Removal Action Work Plan mentions that the pipeline would be cut at Bishop Road and at Sunray Road, there's a figure showing the pipeline cut locations. A pig would be place in the pipeline at Bishop Road and pulled to Sunray Road.

As a separate item NORCO agreed to vacuum out the contents of all pipelines that lead to the former and current barge dock facilities from the cut at Sunray Road. There was no mention of cutting the pipelines in any additional locations in the work plan.

I spoke to Greg Murphy, Mike Ward and Homer Hines and they all stated that the pipelines were cut at Offshore Specialties years ago when the current barge dock facility was put in service. The location of the pipeline cut at Sunray Road was partially chosen because it appears to be a low point in elevation and that the contents of all the pipelines would drain to that point.

NORCO is in the process of determining the locations of the pipelines to Sunray Road and the current barge dock facility.

All pipelines will be photographed.

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>>> < <u>Casanova.Rafael@epamail.epa.gov</u> > 6/16/2006 11:12 AM >>> Stephen, thanks for the response. I am providing this e-mail for documentation purposes.

Gary asked me to follow up on this since he is on vacation. Please refer to Gary's last e-mail concerning your addendum to the removal workplan.

For clarification, it is our understanding that the lines from Bishop Road to Sunray Road will be vacuumed and a "pig" inserted to clean and flush out the lines before abandonment. Is this the case for the lines from Sunray Road to the former and current docking facilities? We need clarification on how a vacuum, and pig, can be applied to those lines without exposing those lines near to the docking facilities. I spoke to Randy Harbison, the general manager for Offshore Specialties, and he informed me that he hasn't been contacted about access to the lines on their property.

Please advise your field staff to obtain visual documentation of the lines at the Sunray Road cut, including piping OD and ID. I mentioned this to Paul Supak (Kleinfelder), but informed him that he should confirm with you on this request.

Also, I met with Michelle Phillips (TCEQ) at the Site. She is following up with Offshore Specialites' response to the 2002 pipeline spill on their property. On Wednesday, we observed seepage of an "oily" substance from the underground pipeline area in the wetlands mentioned in our Attachment A to our responses to NORCO's draft deliverables. She obtained samples for analyses.

Also, I observed 11 lines leading undergound at NORCO's property. I am assuming NORCO will determine the underground locations of these lines.

Michelle informed me that she is aware of a map showing the pipeline locations. I will forward this to you as soon as I receive it.

Please call me if you have any questions. I am working at home at 972-872-9422.

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Rafael Casanova/R6/USEPA/US@EPA,
06/15/2006 07:18 Gary Moore/R6/USEPA/US@EPA,
AM Richard Bergner
< rbergner@flash.net >
cc

Subject Pipeline This email is in response to Rafael's call about the pipeline clean out at the Falcon Refinery. Kleinfelder agreed to vacuum out the contents of all pipelines that leave the refinery. At the Sunray Road pipeline cut the contents of the pipelines will be vacuumed from the Bishop Road cut and from the current and former barge dock facilities.

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KLEINFELDER EXPECT MORE

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